



Sea Island Aviation International, Inc.

P.O. Box 266
Johns Island, SC 29457 USA

23 January 2003

Deputy Director
Flight Standards Service
Federal Aviation Administration
800 Independence Ave, S.W.
Washington, D.C. 20591

Dear Sir or Madam:

Sea Island Aviation International is in the process of applying for a Part 135 Air Carrier Certificate, temporary certificate number ZI5A.

Sea Island Aviation International hereby requests relief from part 135.143(c)(2) which states, in pertinent part,

(c) ATC transponder equipment installed within the time periods indicated must meet the performance and environmental requirements of the following TSO's:

(2) After January 1, 1992: The appropriate class of TSO-C112 (Mode S), For purposes of paragraph (c)(2) of this section, installation does not include:

(i) Temporary installation of TSO-C74b or TSO-C74c substitute equipment, as appropriate, during maintenance of the permanent equipment;

(ii) Reinstallation of equipment after temporary removal for maintenance; or

(iii) For fleet operations, installation of equipment in a fleet aircraft after removal of the equipment for maintenance from another aircraft in the same operator's fleet.

We are requesting such relief for N3524L, a 2001 Cessna Skyhawk 172S for the following reasons:

This aircraft was built by Cessna Aircraft Company for part 91 use in June, 2001 and was equipped with a TSO-C74c transponder. There is no factory option for a TSO-C112 (Mode S) transponder.

To replace the Mode C transponder with a Mode S transponder would cost an estimated \$10,000.00 and would pose an economic hardship to Sea Island Aviation International and to the public who will use our services. Further difficulty would arise due to lack of facilities for Mode S transponder installation, service, and certification. The aircraft is under warranty and the closest Cessna Service Center indicates that they have never installed a Mode S transponder in an aircraft.

Sea Island Aviation International believes that no additional safety benefit would be gained by equipping N3524L with a Mode S transponder, since the aircraft will carry passengers only under VFR.

Granting this exemption will generate benefits in the form of economic relief for Sea Island Aviation International and our customers.

Respectfully Submitted,

Carla Padgett Clark
President/CEO
Sea Island Aviation International, Inc.